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5 Pro Se Claimant,

6 UNITED STATES DISTRICT COURT  
7 FOR THE NORTHERN DISTRICT OF CALIFORNIA

8  
9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 vs.

12 PACIFIC GAS AND ELECTRIC  
13 COMPANY,

14 Defendant,

CASE NO. CR 14-0175 WHA

MOTION TO PRESENT ADDITIONAL  
EVIDENCE IN SUPPORT OF PG&E's  
POTENTIAL CULPABILITY FOR THE  
INITIATION OF THE DIXIE FIRE

Judge: Hon. William Alsup

15 Amici respectfully requests the Court's consideration that the following "working theory" of  
16 the potential cause of the Dixie Fire prepared by The Utility Wildfire Prevention Task  
Force be placed on record:

17 Exhibit A notes that the Line Amperage Readings for Line C stopped at 6:43 AM, while  
18 the Line Amperage Readings for Lines B & C continued until approximately 6:09 PM and  
19 6:55 PM, respectively. This was over one hour after the Troubleman observed two fuses  
open and then opened the third fuse.

20 Exhibit B presents a declaration from the Senior Manager of the Distribution Planning  
21 Group at Pacific Gas and Electric (name redacted) who states that Fuse 17733 is  
22 identified in the Company's Electrical Distribution GIS Database as a 10 Amp Power  
Fuse with a PT63 Polymer cutout. However he notes in paragraph 7 of Exhibit B that  
"The fuses in the photo appear to me to be S&C SMU-20 power fuses".

23 Exhibit C, presents a declaration by a PG&E Senior Consulting Electrical Engineer that  
24 indicates that the actual type of fuse in use was an S&C SMU-20 Power Fuse which was  
the subject of a Utility Bulletin in January, of 2020 (approximately 18 months prior to The  
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**FILED**

**JAN 27 2022**

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NORTH DISTRICT OF CALIFORNIA

1 Dixie Fire) warning that this type of fuse "may not terminate the fault condition" and "the  
2 fuse may continue arcing internally"

3 Amici requests confirmation that the continued observation of line readings following the  
4 Troubleman's observation and action may indicate that the faulty operation of the S&C  
SMU-20 Power Fuse was a potential initiator of the Dixie Fire.

5 Amici further ask why these fuses were still being utilized by PG&E over one and a half  
6 years following the issuance of the Utility Bulletin, and why the PG&E Database showed  
a different type of fuse in use at this location.

7 Amici believe these are important questions which should be part of the record and  
8 available in case of further Federal Legal Action against PG&E for their role in the Dixie  
and could support further consideration of a continuation of Probation.

9 We would respectfully ask the United States Attorney to re-consider a Motion for  
continuation.

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19 **IT IS SO ORDERED.**

20 Date:

Signature: \_\_\_\_\_

21 William H. Alsup  
22 Senior Judge  
23 United States District Court  
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